

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

**CHARITY CHIDINMA  
EMERONYE SWIFT,**

**Plaintiff,**

**v.**

**FRONTIER AIRLINES, INC.  
(a Colorado corporation),  
and JANE DOE,**

**Defendants.**

**Civil Action No. 1:14-cv-1139**

**Hon. Anthony J. Trenga  
Hon. Magistrate Judge Ivan D. Davis**

**JOINT DISCOVERY PLAN**

Pursuant to the Rule 26(f) of the Federal Rules of Civil Procedure and the Local Rules of this Court and the Order of this Court dated December 9, 2014, the parties submit this Joint Discovery Plan.

1. Counsel have conferred to consider the nature and basis of their claims and defenses and the possibilities for settlement or resolution of this case.
2. Counsel agree that the disclosures required by Rule 26(a)(1) will be made on or before January 30, 2015.
3. All discovery shall be completed by April 10, 2015. Counsel agree that all discovery requests must be served so that responses are timely due on or before April 10, 2015.
4. Counsel agree that the disclosures of expert testimony as required by Rule 26(a)(2) shall be made as follows:

a. Plaintiff's disclosure of expert testimony in accordance with Rule 26(a)(2) shall be made on or before February 27, 2015;

b. Defendant's disclosure of expert testimony in accordance with Rule 26(a)(2) shall be made on or before March 27, 2015;

c. Plaintiff's disclosure of expert testimony that is solely contradictory to or in rebuttal of Defendant's disclosure shall be made on or before April 10, 2015.

5. Pursuant to Fed. R. Civ. P. 5(b)(2)(E), the parties agree that service will be accepted by electronic means ("e-mail"), and that service is complete on the day of transmission, provided that the party to be served receives the transmission prior to 12:00 midnight Eastern Time. Any attachments to each filing shall either be e-mailed simultaneously, or faxed as soon as possible following the e-mail transmission, but in no event more than an hour after the email service, unless the parties expressly agree to additional time.

6. The parties do not agree to trial by a magistrate judge.

7. The parties agree to seek an Order of the Court in the event that confidential and/or proprietary information is disclosed during discovery.

8. The parties have discussed issues relating to the preservation of discoverable information as required by Fed. R. Civ. P. 26(f).

9. The parties have discussed discovery of electronically stored information as required by Fed. R. Civ. P. 26(f)(3).

10. The parties have discussed issues relating to claims of privilege or protection of trial preparation materials as required by Fed. R. Civ. P. 26(f)(4).

11. The parties agree that Fed. R. Civ. P. 56 and Local Civil Rule 56 shall govern motions for summary judgment. The parties intend to establish a deadline for the filing of dispositive motions during the final Pretrial Conference with this Court, if not sooner, because Frontier Airlines, Inc. anticipates filing a motion for summary judgment with regard to the claims of Plaintiff.

DATED: January 7, 2015

Respectfully submitted,

/s/

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/s/

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